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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

BLAISE CAROLEO,

Defendant.

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COMPLAINT

(T. 18, U.S.C. § 2252(a)(2))

EASTERN DISTRICT OF NEW YORK, SS:

LESLIE ADAMCZYK, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

On or about February 23, 2016, within the Eastern District of New York and elsewhere, the defendant BLAISE CAROLEO did knowingly receive and distribute any visual depiction, the production of such visual depiction having involved the use of one or more minors engaging in sexually explicit conduct and such visual depiction was of such conduct, using any means or facility of interstate or foreign commerce or that has been mailed, or has been shipped or transported in or affecting interstate or foreign commerce or which contains materials which have been mailed or so shipped or transported, by any means including by computer.

(Title 18, United States Code, Section 2252(a)(2)).

The source of your deponent's information and the grounds for her belief are as follows:

1. I have been employed as a Special Agent with the Federal Bureau of Investigation ("FBI") since 2012. I am currently assigned to the Crimes Against Children squad. I am familiar with the child pornography laws and how child pornography violations are commonly committed. I have been assigned to investigate violations of criminal law relating to the sexual exploitation of children. I have gained expertise in this area through training in classes and daily work related to conducting these types of investigations. As part of my responsibilities, I have been involved in the investigation of numerous child exploitation cases and have reviewed thousands of photographs depicting children (less than eighteen years of age) being sexually exploited by adults. Through my experience in these investigations, I have become familiar with methods of determining whether a child is a minor. I am also a member of the Southern and Eastern Districts of New York, Project Safe Childhood Task Forces.

2. I have personally participated in the investigation of the offenses discussed below. I am familiar with the facts and circumstances of this investigation from my own personal participation in the investigation, my review of documents, my training and experience, and discussions I have had with other law enforcement personnel concerning the creation, distribution, and proliferation of child pornography. The FBI is investigating the production, possession, access with intent to view, transportation, receipt, distribution and reproduction of sexually explicit material relating to children, in violation of Title 18, United States Code, Sections 2251, 2252 and 2252A.

3. On February 24, 2016, the New York Police Department ("NYPD") arrested the defendant BLAISE CAROLEO for assaulting a bus driver. CAROLEO was subsequently charged with assault on a bus driver. At the time of his arrest, CAROLEO possessed a Motorola XT1565 Droid MAXX2 (the "Phone"). The NYPD seized the Phone at the time of CAROLEO's arrest.

4. The Manhattan District Attorney's Office obtained a Consent to Search for the Phone, which was executed on August 13, 2015. The FBI later obtained a search warrant for the Phone, issued by the Honorable Viktor Pohorelsky, United States Magistrate Judge for the Eastern District of New York, which was executed on September 9, 2016.

5. The Phone contained substantial evidence that the defendant BLAISE CAROLEO engaged in sexually explicit conduct with a minor victim ("VICTIM 1"), as well as other minors. Additionally, CAROLEO used the Phone to induce and to attempt to induce at least five minors to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct. Based on the investigation thus far, the minors appear to live in Michigan, Minnesota, and elsewhere in the United States.

6. The Phone contained Kik, a social media application that allows users to transmit text messages, as well as image and video files. Kik Messenger can be used on a computer if the user has downloaded software that can emulate a mobile device. An example of such software is "Bluestacks." The account name for the Kik application installed on the defendant BLAISE CAROLEO's phone was "Nimfeater." A review of Nimfeater's Kik activity revealed a series of Kik messages between "Nimfeater" and various Kik users, who have been identified as minors, in which CAROLEO requests photographs of the minor's

genitalia. In addition, CAROLEO sent nude pictures of himself, including pictures of his penis, to the minors.

7. The FBI subpoenaed Kik for subscriber records regarding the username "Nimfeater." Kik's subpoena response revealed the following information about "Nimfeater":

> First Name: Be
> Last Name: yourself
> Username: nimfeater
> Location IP address on 9/26/2016: 173.68.88.104

8. The FBI subpoenaed Verizon Fios for 173.68.88.104, the IP address associated with the "Nimfeater" Kik account. Verizon's subpoena response revealed that the account was subscribed to Blaise Caroleo at an address in Staten Island, New York (the "Caroleo residence").

9. A review of the contents of Phone revealed numerous Kik messages between the defendant BLAISE CAROLEO and VICTIM 1, whose Kik Username is "Lilshorty1238." On February 23, 2016, CAROLEO, using the Kik identifier "Nimfeater," sent numerous messages to VICTIM 1 asking VICTIM 1 to take close-up photos of her vagina and send them to CAROLEO on Kik. The Kik messages between VICTIM 1 and CAROLEO show that VICTIM 1 took such photos and sent them to CAROLEO.

10. After the defendant BLAISE CAROLEO received the first photo of VICTIM 1's vagina, CAROLEO directed VICTIM 1 to send more photos, including a photo of "the top of ur clit." Based on my training and experience, I know that the term "ur" is text slang for "your," and "clit" refers to the clitoris. Approximately 30 seconds later, VICTIM 1 sent

CAROLEO a close-up image of a vagina with two fingers with blue nail polish spreading the vagina open to expose the clitoris.

11. On the same date, the defendant BLAISE CAROLEO asked VICTIM 1 her age. VICTIM 1 responded "Im 15." CAROLEO also asked VICTIM 1 to send a photo of her face. In response to this request, VICTIM 1 sent a photo of a girl who, based on my training an experience, appears to be approximately 15 years old.

12. I believe VICTIM 1 to be a minor based on her appearance in the aforementioned photographs sent via Kik, VICTIM 1's statements to the defendant BLAISE CAROLEO stating that she was fifteen. In addition, the email address linked to VICTIM 1's Kik account is also linked to a Facebook account. Photographs of VICTIM 1 in the Facebook account are consistent in appearance with the photographs VICTIM 1 sent to CAROLEO via Kik. On Facebook, VICTIM 1 identifies herself as a "freshman," which is consistent with the age—15—that she reported to CAROLEO.

13. A review of the contents of the defendant BLAISE CAROLEO's Phone reveal that CAROLEO also exchanged Kik messages with VICTIM 2, whose Kik Username is "heyhotboysunder14." In response to a request from CAROLEO to "Show me u," VICTIM 2 sent a photograph of the face of a minor female who appears to be approximately 12 to 13 years old. VICTIM 2 later stated that she was twelve years old.

14. In response to a request from the defendant BLAISE CAROLEO to "see u in just ur undies or less," VICTIM 2 sent CAROLEO a photograph of a finger being inserted into a vagina. In response to a request from CAROLEO to "show ur tits n face I wanna jerk off looking at u," VICTIM 2 sent a photograph of a minor female, who appears to be the

same minor female as in the images described above, with her mouth near her nipple. Finally, CAROLEO asked VICTIM 2: "Can u vid u fingering urself."

15. In addition to the above evidence, numerous images of child pornography were discovered on the defendant BLAISE CAROLEO'S PHONE. A description of some of these images follows:

a. 1456036462947.jpg is an image of a girl age approximately 7 to 9 years old with her legs spread exposing her vagina. There is an adult finger penetrating the girl's vagina.

b. 0a4a69e5-a85c-4af3-be79-277ddd2af11a.jpg is a 44-second video file of a girl age approximately 7 to 9 years old lying on a bed with her vagina exposed. Throughout the video, the camera is focused on her vagina. There is an adult male penis penetrating her vagina.

c. 6977d184-bb9c-45d1-9c11-340e37e795be.jpg is a 54-second video file of a girl age approximately 7 to 9 years old lying on a bed with her legs spread and her vagina exposed. An adult male hand is digitally penetrating the girl's vagina.

d. Cf997041-3aa6-4bf3-af94-5cefb919ab69.jpg is a one-minute, six-second video file of a girl age approximately 8 to 10 years old performing oral sex on an adult male.

16. On October 11, 2016, the Honorable Robert M. Levy, United States Magistrate Judge for the Eastern District of New York, authorized a search warrant of the Caroleo residence. The FBI executed the search warrant on October 12, 2016. The defendant BLAISE CAROLEO was present in his house when the FBI executed the warrant.

The FBI seized one tablet and two additional phones (the "Devices") from CAROLEO during the search, which CAROLEO acknowledged to be his.[1]

17. Based on a preliminary review of the Devices, they contain a large volume of additional Kik chats and nude pictures sent between the defendant BLAISE CAROLEO and other Kik users who appear to be minors. For example, the tablet contains additional Kik messages that CAROLEO exchanged with VICTIM 1. In those messages, CAROLEO instructed VICTIM 1 to masturbate and to moan, to which VICTIM 1 replied, in sum and substance, "I don't want to moan too loudly or else my mom will hear." VICTIM 1 then sent CAROLEO a video of herself inserting a plastic bottle into her vagina.

18. The defendant BLAISE CAROLEO spoke with the FBI during the search. CAROLEO stated to the FBI that he used Kik to talk to minors and to have them send him nude photographs of themselves.

WHEREFORE, your deponent respectfully requests that the defendant BLAISE CAROLEO be dealt with according to law.

Leslie Adamczyk
Special Agent
Federal Bureau of Investigation

Sworn to before me this
12th day of October, 2016

THE HONORABLE ROBERT M. LEVY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

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[1] During the search, the FBI also located two revolvers and one handgun in a safe.